

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SYRACUSE MOUNTAINS  
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Defendant.

Civil Action No.: 21-cv-02678-AT

**DECLARATION OF MICHAEL A. DEBERNARDIS IN SUPPORT OF  
PLAINTIFF'S MOTION FOR RELIEF PURSUANT TO 28 U.S.C. § 1610(c)**

I, Michael A. DeBernardis, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm Hughes Hubbard & Reed LLP and counsel of record for Plaintiff Syracuse Mountains Corporation (“Syracuse”) in the above-captioned case. In that capacity, I have personal knowledge of the facts and circumstances set forth herein.

2. I submit this Declaration on behalf of Syracuse in support of Syracuse’s Motion for Relief Pursuant to 28 U.S.C. § 1610(c), dated March 13, 2024.

3. On July 20, 2023, this Court entered default judgment in favor of Syracuse (the “Default Judgment”). Dkt. 49.

4. On August 25, 2023, the Clerk of Court mailed two copies of the Default Judgment to the U.S. Department of State for service on Defendant the Bolivarian Republic of Venezuela (“Venezuela”) pursuant to 28 U.S.C. §§ 1608(a)(4), 1608(e). Dkt. 50.

5. On February 21, 2024, the U.S. Department of State confirmed to Ms. Ruby J.

Krajick, Clerk of the Court, and to Plaintiff via United States Mail that the Default Judgment (along with the Notice of Default Judgment, the Court's Order, dated July 5, 2023, and translations thereof) had been delivered to Venezuela on January 13, 2024. Ex. 1.

6. The Default Judgment has not been satisfied and, as of the date of this declaration, the Default Judgment remains outstanding. To my knowledge, Venezuela has initiated no discussion concerning whole or partial satisfaction of the Default Judgment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2024

/s/ Michael A. DeBernardis  
Michael A. DeBernardis